

Affordable Assisted Living Coalition

Comments on 1115 Waiver Concept Paper

November 25, 2013

My name is Wayne Smallwood. I am Executive Director of The Affordable Assisted Living Coalition (AALC). AALC is a not-for-profit 501(c)(6) trade association that represents Supportive Living Facilities (SLFs). SLFs are one of the nine HCBS waiver programs in Illinois. AALC appreciates the opportunity to make comments on the Concept Paper for an 1115 Waiver for Illinois Medicaid.

SLFs have been in existence since 1999. There are currently 143 operating SLFs with 11,500+ apartments in 73 counties. SLFs are different from the other waivers in that they offer private apartment-style housing complemented with a range of person-centered/directed healthcare and hospitality services to frail seniors and the physically disabled aged 22-64. There is high satisfaction of the model by SLF residents as demonstrated by ongoing resident satisfaction surveys monitored by the Illinois Department of Healthcare and Family Services. SLFs also receive high praise from comments made by residents and family members who believe SLFs have improved the quality of life of those fortunate enough to experience the lifestyle.

The concept paper refers to four “pathways” for transformation. One of the four is rebuilding and expanding the home and community-based infrastructure with a focus on individual needs and preferences rather than disability. AALC applauds this concept and believes SLFs can contribute by expanding its current service population to include those with complex health and behavioral health needs. SLFs have shown an ability to master development of its sites using a variety of layered financing options such as low incomes housing tax credits, HOME funds, HUD guaranteed loan programs and historic preservation tax credits to name a few. SLFs could help offer housing with services to persons with serious mental illness and to others with more complex health needs. Some concern has been expressed by SLFs that consolidating the existing HCBS waivers under the 1115 waiver may lead to a loss of Medicaid capacity and in program identity for SLFs. This has been seen in other states that incorporate the housing with services option with other waiver alternatives under one umbrella waiver program.

Another one of the pathways to transformation is developing and using an integrated delivery system centered on patient-centered health homes. AALC supports this concept and believes SLFs could be integral as a partner in helping to achieve the goals in such a system. SLFs already have demonstrated the ability to help the State reduce costs in long term care. SLF tenants have a growing average length of residency of over two years and have proven to reduce hospital and nursing home admissions and readmissions. SLFs welcome the chance to participate in outcome-based reimbursement. Many SLFs have signed contracts and are participating in the Integrated Care Program. Many SLFs have signed contracts and are eager to participate in the Medicare-Medicaid Alignment Initiative and other care coordination innovations being offered by Illinois. AALC also offers that SLFs may be able to help the

State by working to develop and participating in a new “provider tax” for SLFs that could enhance Medicaid revenue. While such an approach is not available under 1915(c) HCBS waivers, the flexibility allowed by an 1115 waiver could make this worth exploring.

A third pathway to transformation calls for a new focus on “population health”. AALC heartily supports this concept with SLFs embodying much of what is conceived through prevention, primary care and wellness. In fact, SLFs promote prevention and wellness by providing health education through and participation in evidenced-based programs such as Fit & Strong, Chronic Disease Self-Management Program, Diabetes Self-Management Program and a Matter of Balance. Regular physical and mental exercises are promoted and conducted by SLFs to enhance wellness and good health.

The fourth pathway to transformation is workforce. Again, AALC supports this concept to build a modern healthcare workforce. While much of the concept seems to be aimed at increasing the number of qualified PCP and PCP physician extenders, AALC also recommends that attention be given to the national professional nursing shortage and what can be done to incentivize more nurses.

Summary

AALC supports the overall concept of the health care transformation as put forth in the paper and SLFs stand ready to help with the process. AALC believes that adequate affordable housing with services can contribute to improved health outcomes. It is stated well in the HMA research paper “Health and Wellness Outcomes Measurement” (May 2013)(authored by Michael Nardone, Matt Roan and Linda Trowbridge): “The impact of stable, affordable housing goes beyond providing a place to live. Affordable Housing providers are focused on providing their residents with supports that impact a wide range of quality of life factors including employment and financial stability, education and youth development, community engagement, and health and wellness.” (Page 4).